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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

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To: The Public Service Commission of Utah

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The Division of Public Utilities
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Date: February 23, 2011

Subject: Rocky Mountain Power Cool Keeper Program, Schedule 114
White-Rodgers Malfunctioning Programmable Thermostat

Background

On December, 22, 2010, Rocky Mountain Power (the "Company") filed notification with the Public Service Commission of a malfunction with the White-Rodgers programmable thermostat (model #1F88). The Company was informed of the malfunction by its administrative vendor, Comverge, Inc. The malfunction is caused by battery leakage which could result in the risk of fire within the thermostat. Comverge submitted a corrective action plan to the Federal Consumer Product Safety Commission to resolve the malfunction which was approved on December 7, 2011. The Company reported this plan in its filing. Currently 743 Rocky Mountain Power customers have the model #1F88 thermostat installed. The action plan involves:

Removing the batteries and installing warning labels in all 1F88 thermostats. The thermostat does not need the batteries to operate properly. The batteries are in the thermostat only as a backup for the clock in the event of a power loss. Cool Keeper customers normally receive a signal from the pager system twice a day that will reset the thermostat clock.

For thermostats already installed in the field, a mailing packet with instructions will direct the customer to remove the batteries from the thermostat. Included with the packet is a plastic plug for insertion into the battery compartment to help prevent future battery usage, warning label sticker, and a postage paid card to be returned to the vendor to inform that the corrective action has taken place. In addition, the vendor will operate and staff a call center for customers who need additional information and/or help.

Comverge will also provide a website for further instruction and tracking to ensure the action plan is implemented.

Discussion

While only 3 out of 188,000 thermostats have had incidents, it only takes one incident to cause monetary damage and human harm. The Office commends the Company for reporting the situation, having a plan to deal with the malfunctions and implementing the plan.

Recommendations

While the Company is undertaking this corrective action it should provide updates of the status of the plan to the DSM Advisory Group as well as a timeline for the expected completion of the plan.